

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIMSYS, INC.,	)	
	)	
Plaintiff,	)	Civil Action No. 2:23-cv-01630-CRE
	)	
v.	)	
	)	
KAREN COHN,	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR EXPEDITED HEARING**

Rimsys, Inc. (“Rimsys” or “Plaintiff”), by and through its undersigned counsel, moves this Court for an Order expediting the hearing on Plaintiff’s Motion for Temporary Restraining Order and Preliminary Injunction, and states as follows:

1. On September 11, 2023, Rimsys filed a Verified Complaint, seeking to enjoin Defendant Karen Cohn (“Cohn”) from misappropriating its Confidential Information and Trade Secrets (as defined in the Verified Complaint) and breaching her contractual, statutory, and/or common law obligations to Rimsys.

2. On September 12, 2023, Rimsys filed a Motion for Temporary Restraining Order and Preliminary Injunction and supporting Memorandum of Law, which are incorporated by reference.

3. As set forth in the Verified Complaint, Cohn’s actions constitute violations of the Defend Trade Secrets Act and the Pennsylvania Uniform Trade Secrets Act, breaches of Cohn’s Agreement (as defined in the Verified Complaint) with Rimsys, a breach of her fiduciary duty to Rimsys, and unfair competition. *See generally* ECF No. 1.

4. Cohn’s unlawful conduct has caused, is causing, and will continue to cause irreparable harm to Rimsys.

5. Rimsys has also filed a Motion for Expedited Discovery.

6. Because of the severity and ongoing nature of Rimsys' injury, to protect Rimsys' Confidential Information and Trade Secrets, and to preserve the status quo as it existed prior to Cohn's unlawful conduct, Rimsys requests that this Court schedule an expedited hearing on its Motion for Temporary Restraining Order and Preliminary Injunction following a brief period of expedited discovery, as set forth in Plaintiff's Motion for Expedited Discovery.

WHEREFORE, Rimsys respectfully requests that this Court set a hearing date on its Motion for Temporary Restraining Order and Preliminary Injunction as soon as practicable.

Dated: September 12, 2023

Respectfully submitted,

MEYER UNKOVIC SCOTT LLP

By: /s/ Antoinette C. Oliver  
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*ATTORNEYS FOR PLAINTIFF  
RIMSYS, INC.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this **PLAINTIFF'S MOTION FOR EXPEDITED HEARING** has been served upon the following this 12th day of September, 2023, in the manner described below:

**VIA HAND DELIVERY BY PROCESS SERVER  
AND EMAIL**  
Karen Cohn  
709 Filbert Street  
Pittsburgh, PA 15232  
knutsonkarenann@gmail.com

/s/ Antoinette C. Oliver

Antoinette C. Oliver